

Allnet Communication Services, Inc.
Public Policy and Government Affairs
1990 M Street, NW Suite 500
Washington, D.C. 20036
(202) 293-0593
(202) 833-9576 (FAX)



Roy L. Morris
Director, and
Regulatory
Counsel

Main Offices:
30300 Telegraph Road
Bingham Farms, Michigan 48025-4510

EX PARTE OR LATE FILED

February 1, 1995

Mr. William Caton
Secretary
FCC
1919 M Street, NW
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**Re: Policies and Rules Concerning Unauthorized Changes of Consumers
Long Distance Carriers, CC Docket No. 94-129, Ex Parte**

Dear Mr. Caton:

EX-100-100 ORIGINAL

Today LaRene Flack and I met with members of the Enforcement Division to discuss our comments in the above referenced proceeding.

Please feel free to call the undersigned with any questions.

Respectfully,

A handwritten signature in dark ink, appearing to read "R. L. Morris".
Roy L. Morris

cc: Robert Spangler
Kathie Kneff
Wilbert E. Nixon, Jr.
Linda Freeman

Enclosures

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Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers

**Comments of
Allnet Communication Services, Inc.**

February 1, 1995

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Allnet Position On FCC Proposals:

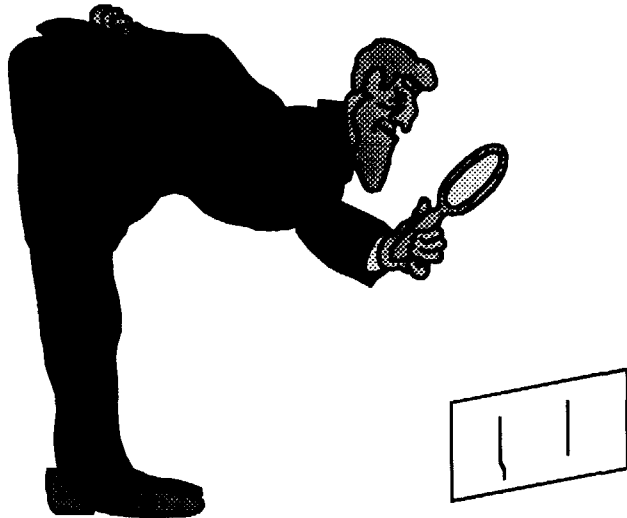
■ We agree!

- Separate Paper for "LOA" (no inducements)
- No Negative Options
- Minimum Point Size



Extensions of FCC Proposal:

- Specify Exact LOA Wording
- Accommodate IntraLATA Presubscription
- Require LOAs for All Orders
- Valid for only one change within 90 days from sign date
 - Avoid “Recycling” of LOAs



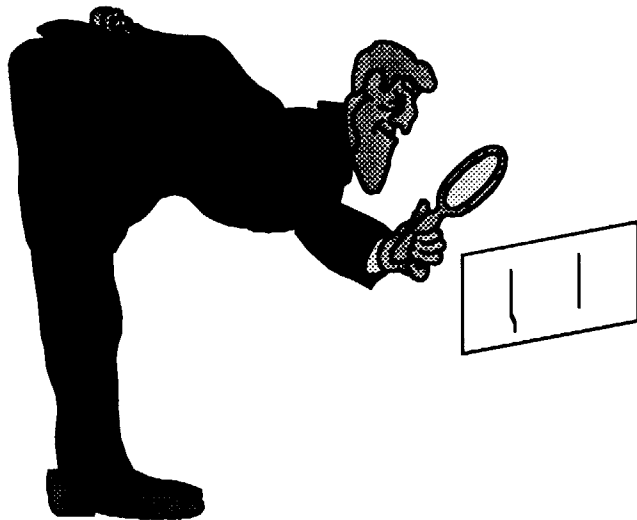
... Extensions of FCC Proposal:

■ Require Rate Adjustment Only After Complaint Ruling

- Otherwise Would Promote “LD” surfing by fraudulent slamming “victims” who seek to avoid long distance charges.

■ Clarify Obligations of LECs and Underlying IXC

- LECs and Underlying IXCs
 - They only see IXC reseller LOA (if one exists) after dispute, thus they are not in position to enforce.
 - They face a “Hobson’s Choice”



Suggested Rule Modifications:

- See Allnet Comments, Filed January 9, 1995, for details.

